

**BAKER
&
HOSTETLER** LLP
COUNSELLORS AT LAW

DOCKET FILE COPY ORIGINAL

WASHINGTON SQUARE, SUITE 1100 • 1050 CONNECTICUT AVENUE, N.W. • WASHINGTON, D.C. 20036-5304 • (202) 861-1500

FAX (202) 861-1783

WRITER'S DIRECT DIAL NUMBER

(202) 861-1728

RECEIVED

January 24, 1997

JAN 24 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

VIA HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Re: Advanced Television Systems and Their Impact upon the
Existing Television Broadcast Service
MM Docket No. 87-268
Reply Comments

Dear Mr. Caton:

Tanana Valley Television Company, through counsel, hereby
files the original and five copies of its reply comments to the
Sixth Further Notice of Proposed Rule Making in MM Docket No. 87-
268. Please contact the undersigned if you have any questions.

Sincerely,



Ann K. Ford
Michael Ruger

Enclosures

No. of Copies rec'd
List ABCDE

045

DOCKET FILE COPY ORIGINAL

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

JAN 24 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Advanced Television Systems)
and Their Impact Upon the)
Existing Television Broadcast)
Service)

MM Docket No. 87-268

To: The Commission

REPLY COMMENTS

1. Tanana Valley Television Company ("Tanana Valley"), licensee of Station KFXF(TV), Channel 7, Fairbanks, Alaska, and LPTV Station K13XD, Channel 13, Fairbanks, hereby files these brief Reply Comments in response to the Commission's Sixth Further Notice of Proposed Rule Making (FCC 96-207, released August 14, 1996). Tanana Valley continues to encourage the Commission to provide DTV allotments for its Station KFXF(TV) and for Channel 13 at Fairbanks concurrently with other DTV channel allotments.

Background

2. As Tanana Valley explained in its comments to this proceeding, Station KFXF(TV), a Fox affiliate, and LPTV Station K13XD, a CBS affiliate, provide much-needed, over-the-air broadcast services to the residents in and around Fairbanks. Neither Station KFXF(TV) nor vacant but applied-for Channel 13 were assigned DTV allotments. Indeed, under the FCC's proposed DTV allotment plan, Fairbanks Channel 13 would be used as a DTV allotment, thereby precluding the operation of Station K13XD.

3. Tanana Valley requested the Commission to provide a DTV allotment to Channel 7, and to adopt a DTV allotment plan which would not preclude the operation of Channel 13. Tanana Valley included an engineering study which demonstrated that there is more than sufficient spectrum in Fairbanks to permit the reservation of DTV channels for all operating television stations in the Fairbanks area, including Stations KFXF(TV) and K13XD. The engineering study offered two specific channel allotment scenarios, one presuming the adoption of the "core spectrum" plan and the second presuming the availability of all television channels.

Discussion

4. The Alaska Broadcasters Association ("ABA") filed comments in response to the Sixth Further Notice of Proposed Rule Making which propose DTV allotments for Fairbanks Channels 7 and 13. The ABA's comments offer additional evidence that there is more than sufficient spectrum to accommodate all channels in Fairbanks. Tanana Valley intends to work with the ABA to develop a channel allotment plan which will be satisfactory to all broadcasters in Fairbanks.

Conclusion

5. As Tanana Valley noted in its comments, the Fairbanks market may be unique. The four television stations in and around the community provide the only available broadcast signals, and a LPTV provides a network affiliate service. Only 38% of local residents subscribe to cable; therefore, the community is heavily dependent upon over-the-air broadcast services. Tanana Valley and

the ABA have demonstrated that there is sufficient spectrum available in the Fairbanks market to accommodate all operating full-power, as well as applied-for, television stations. Therefore, Tanana Valley submits that the public interest would be served by the provision of DTV allotments for Channels 7 and 13, as well as other operating television stations, in the Fairbanks market.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Michael Ruger", is written over a horizontal line.

Ann K. Ford
Michael Ruger

Counsel for Tanana Valley Television
Company

Baker & Hostetler LLP
1050 Connecticut Avenue, NW
Suite 1100
Washington, DC 20036-5304

Telephone (202) 861-1500

Filed: January 24, 1997